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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL SIQUEIROS, TODD AND JILL CRALLEY, JOSEPH BRANNAN, LARRY GOODWIN, MARC PERKINS, DONALD LUDINGTON, THOMAS SHORTER, DERICK BRADFORD, GABRIEL DEL VALLE, KEVIN HANNEKEN, EDWIN AND KATELYN DOEPEL, DAN MADSON, JAMES FAULKNER, JOSEPH OLIVIER, SCOTT SMITH, ROSS DAHL, DREW PETERSON, MICHAEL WARE, STEVE KITCHEN, JOHN NEUBAUER, BARBARA MOLINA, DENNIS VITA, STEVEN EHRKE, BILL MAUCH, THOMAS GULLING, RONALD JONES, MIKE WARPINSKI, JOHN GRAZIANO, JOSHUA BYRGE, RUDY SANCHEZ, CHRISTOPHER THACKER, RANDY CLAUSEN, KELLY HARRIS, JAMES ROBERTSON, and JONAS BEDNAREK, individually and on behalf of all others similarly situated,

#### **Plaintiffs.**

V.

## GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND [PROPOSED] ORDER  
RE TIMING OF FILING THIRD AMENDED  
COMPLAINT**

**WHEREAS**, in its Order Granting In Part and Denying In Part Defendant’s Motion to Dismiss Second Amended Complaint (the “Order,” Dkt. No. 99), the Court granted Plaintiffs leave to file an amended complaint by March 9, 2018;

**WHEREAS**, Plaintiffs intend to file a Third Amended Complaint to address issues raised in the Order;

**WHEREAS**, Plaintiffs seek leave to add a new plaintiff to the Third Amended Complaint;

**WHEREAS**, Plaintiffs' counsel requires additional time to confer with certain of Plaintiffs to address certain issues raised in the Order;

**IT IS HEREBY STIPULATED**, by and between Plaintiffs and GM, by their undersigned counsel, that, subject to the approval of the Court, Plaintiffs may file their Third Amended Complaint by March 23, 2018, with leave to add one or more new plaintiffs.

Dated: March 9, 2018

/s/ Adam J. Levitt  
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***Counsel for Plaintiffs and the Proposed Classes***

/s/ Joseph J. Ybarra  
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***Counsel for General Motors LLC***

1 PURSUANT TO STIPULATION IT IS SO ORDERED  
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4 Dated: March 9, 2018  
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### **ECF CERTIFICATION**

Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories to the document.

Date: March 9, 2018

By: /s/ Jennie Anderson  
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